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18 UNITED STATES DISTRICT COURT
19 EASTERN DISTRICT OF CALIFORNIA

20
21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 JUAN CARLOS IBAL-CURIEL,

25 Defendant.

26 CASE NO: 1:25-CR-00078-KES-BAM

27 STIPULATION BETWEEN THE UNITED STATES
28 AND DEFENDANT REGARDING PRODUCTION
OF PROTECTED INFORMATION; PROTECTIVE
ORDER

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8 WHEREAS, the discovery in this case contains private personal information regarding third
9 parties, including but not limited to their names, ages, and/or physical descriptions (“Protected
10 Information”); and

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12 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the
13 unauthorized disclosure or dissemination of this information to anyone not a party to the court
14 proceedings in this matter;

15 The parties agree that entry of a stipulated protective order is therefore appropriate.

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17 THEREFORE, defendant JUAN CARLOS-IBAL-CURIEL, by and through his counsel of
18 record, David Torres (“Defense Counsel”), and the United States of America, by and through Assistant
19 United States Attorney Brittany M. Gunter, hereby agree and stipulate as follows:

1 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
2 Criminal Procedure, as well as its general supervisory authority.

3 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
4 part of discovery in this case (hereafter, collectively known as “the discovery”).

5 3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any
6 documents or other information that contain Protected Information with anyone other than Defense
7 Counsel’s attorneys, designated defense investigators, designated defense experts, and support staff.
8 Defense Counsel may permit the defendant to view unredacted documents or other information in the
9 presence of his attorneys, defense investigators, and/or support staff. The parties agree that Defense
10 Counsel, defense investigators, and support staff shall not allow the defendant to copy Protected
11 Information contained in the discovery. The parties agree that Defense Counsel, defense investigators,
12 and support staff may provide the defendant with copies of documents or other information, if any, from
13 which Protected Information has first been redacted.

14 4. The discovery and information therein may be used only in connection with the litigation
15 of this case and for no other purpose. The discovery is now and will forever remain the property of the
16 United States of America (“Government”). Defense Counsel will return the discovery to the Government
17 or alternatively keep it archived within its sole possession at the conclusion of the case.

18 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
19 ensure that it is not disclosed to third persons in violation of this agreement.

20 6. Defense Counsel shall be responsible for advising the Defendant, employees, and other
21 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

22 7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to
23 return the discovery to the government, or, at the request of government counsel, to forward it to new
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1 counsel after new counsel has confirmed to government counsel in writing his or her agreement to the
2 terms of this Order.

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4 IT IS SO STIPULATED.

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Dated: April 22, 2025

By: /s/ DAVID TORRES
DAVID TORRES
Attorney for Defendant

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Dated: April 22, 2025

MICHELE BECKWITH
Acting United States Attorney

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By: /s/ BRITTANY M. GUNTER
BRITTANY M. GUNTER
Assistant U.S. Attorney

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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CASE NO. 1:25-CR-00078-KES-BAM

Plaintiff,

PROTECTIVE ORDER

v.

JUAN CARLOS IBAL-CURIEL,

Defendant.

IT IS SO ORDERED.

Dated: April 23, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE